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WESTERN DISTRICT OF TEXAS
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Speech-to-Text Institute, Inc.
401 Edgewater Place, Suite 600
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FILED

MAY 19 2023

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY 
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United States District Court Western District of Texas
500 West 5th Street
Austin, Texas 78701

Civil Action No. 1:23-CV-00421-LY

AUSTIN LEGAL VIDEO, LLC, DEPO-NOTES, LLC, and PASQUAL PEREZ, III vs.
DEPOSITION SOLUTIONS, LLC D/B/A LEXITAS, COURT REPORTERS
CLEARINGHOUSE, INC., ALDER.SON § REPORTING CONIPANY, INC.,
SOUTHEAST REPORTING & VIDEO § SERVICE, INC., KENNEDY § REPORTING
SERVICE, INC., TEXAS COURT REPORTERS ASSOCIATION, INC., SPEECH TO
TEXT INSTITUTE, INC., SHERRI FISHER, LORRIE SCHNOOR, SONIA TREVINO,
AND SHELLY TUCKER

RESPONSE TO CIVIL ACTION

The Speech to Text Institute, Inc. ("STTI") hereby responds to the above-cited Civil Action by Austin Legal Video, LLC, as follows:

- Affirmative Defense 1. Per Clause 30, While Mr. Steve Townsend is the current President of STTI, he was never the President of the National Court Reporters Association.
- Affirmative Defense 2. Per Clause 31, the characterization that "STTI is a trade association whose primary function appears to be to assist the court reporting industries' efforts to repel these "barbarians" is not correct.

Per its website (see <https://speechtotextinstitute.org/about-us/>) the stated vision and mission of STTI are as follows:

Mission Statement

To lead the speech-to-text industry by setting standards of competence, professionalism, and service.

Vision Statement

STTI's vision is to create a constructive path forward for the speech-to-text industry and its service to the legal community by acknowledging the merits of all

technologies, working deliberately to establish standards and best practices, and building a spirit of cooperation that breeds innovation and protects the sanctity of the official record.

- Affirmative Defense 3. Other than quoting Mr. Townsend and referencing his association with STTI, the Civil Action makes no other specific claims against our organization.
- Affirmative Defense 4. STTI has never had any association with Austin Video or any of its affiliate companies.
- Affirmative Defense 5. None of the other named defendants have ever held a leadership position in STTI.

WHEREFORE, requests for judgment dismissing Speech to Text Institute, Inc., from this Civil Action with prejudice, and for such other and further relief as this Court may deem just and equitable.

Respectfully submitted,

Greg Kohn
Executive Manager
Speech to Text Institute, Inc.
c/o Virtual, Inc.

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15 MAY 2023 PM 4 L



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Austin TX 78701

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